

Uniform Proposal Review Procedure

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Northern Michigan University Uniform Proposal Review Policy

A. POLICY STATEMENT, DESCRIPTIONS OF PROCESS, AND MANDATORY REQUIREMENTS

Policy Statement

The Purpose of this policy is to ensure a uniform and consistent review of all proposals submitted by Northern Michigan University to sponsors for funding, and ensures compliance with sponsor/agency, state, federal, and university regulations and policies.

1. Definitions

Sponsored Programs

A *sponsored program* is a research or educational project that is funded by a source outside the institution. Activities funded through grants, contracts and cooperative agreements are sponsored programs. A sponsored program is initiated with a proposal (sometimes referred to as an application) to the sponsor and followed by an award with specific terms, objectives, rights and reporting requirements. The sponsor, whether it is federal, state, or private, holds the University accountable to meet designated terms in exchange for project funding.

Sponsors include federal agencies, state and local governments, private foundations, businesses and corporations, and foreign organizations. Federal agencies and many private foundations have detailed information on funding opportunities on their web sites.

Proposals

A *proposal* is a request made of a sponsor to fund a project. Proposals may be submitted in response to a solicitation (e.g., a Request for Proposals, an Announcement of Opportunity, a Request for Applications, etc.) or unsolicited. Proposals for external funding are submitted

on behalf of NMU, but composed and executed by the Principal Investigator (PI). The resulting awards are made to NMU and managed by the PI and NMU's post-award authority (Grants & Contracts Office and Controller's Office). For the purpose of this policy, grant proposals, cooperative agreements*, memorandums of understanding/agreement*, reimbursable services agreements, and revisions to non-awarded proposals are referred to as "proposals." All proposals must receive Authorized Organizational Representative (AOR) approval **before** submission to a sponsor.

Authorized Organizational Representative (AOR)

The AOR is the individual within NMU who has been delegated signature authority by the Provost to approve proposal submissions to external sponsors. By signing as AOR, this person is assuring that NMU is prepared to committing to providing all necessary facilities, resources and support necessary to complete the proposed project and accepting the legal obligation to ensure proposed work is completed should the award be granted. The Contracting Official has sole authority to commit NMU to the parameters of the contract/agreement with the sponsor should the award be granted.

The AOR at NMU is the Director of Grants and Contracts. The AOR holds sole responsibility of granting institutional approval to proposal submissions. The Contracting Official is the Vice President of Finance and Administration. The CO has sole authority to commit the University to any grant/contract/cooperative agreement in the event a proposal is awarded.

*Cooperative agreements and MOUs/MOAs executed within the scope of facilitating a sponsored program only.

2. Certification When Signing a Proposal

The Principal Investigator's (PI) signature certifies:

- An agreement to do all work as proposed;
- That there are no significant conflicts of interest (financial or other; see [NMU's Conflicts of Interest policy](#));
- An agreement to be the overall project manager;
- An agreement to abide by all applicable regulations, policies and procedures related to the project; and
- An agreement to accept responsibility for the scientific and ethical conduct of his/her project.

The Co-Investigator's (Co-I/Co-PI) signature certifies:

- An agreement to do all work as proposed;
- That there are no significant conflicts of interest (financial or other);
- An agreement to abide by all applicable regulations, policies and procedures related to the project; and
- An agreement to accept responsibility for the scientific and ethical conduct of his/her portion of the project.

The Dean's/Director's/Department Head's signature certifies:

- That PI and Co-I/Co-PI workloads are within 100% of effort;
- That unit resources are available and allocated;
- That matching/cost share commitments are authorized and committed; and
- That all space considerations in the project have been accounted for.

The Controller's Office Fiscal Officer's signature certifies:

- That the proposal budget is in compliance with sponsor/agency, state, federal, and university policies, regulations, and standards, and the Contracting Official has reviewed and approved the budget.

The Grants and Contracts Office signature certifies:

- That the proposal review was conducted in accordance with this policy; and
- That the proposal passes that review sufficiently to receive institutional approval.

The Authorized Organizational Representative's (AOR) signature certifies that:

- NMU has the appropriate facilities, resources, and systems in place to administer and monitor the award in compliance with sponsor/agency, state, federal, and university policies, regulations, and standards, as well as requirements defined in the Office of Management and Budget's 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and audit Requirements for Federal Awards (hereafter referred to as OMB Uniform Guidance);
- NMU is committed to the project and agrees to complete the project as proposed if an award is made; and
- That all certifications and assurances in the proposal are understood, are true statements, are agreed to, and will be abided by.

3. The Proposal Review Process

The following review process is mandatory for all proposals originating from NMU departments/institutes/schools (units) before AOR approval will be granted. NMU's Grants and Contracts Office conducts these reviews. Units/ PI's should allow ample time to work with Grants and Contracts in proposal development to allow **five business days** (at minimum) for final proposal review and potential AOR approval.

a. Proposal Routing Form Review

Each proposal will include a Proposal Transmittal Form (formerly known as a "green sheet"). This form ensures that uniform information about the proposal will be tracked and readily identifiable as the proposal moves through the pre-award and post-award phases. The Proposal Transmittal Form will be reviewed for accuracy, consistency, and special considerations as outlined:

- Ensure the PI is a faculty member, has an approved exemption, or has included a memo to the AOR to request exemption from any the NMU PI Policy.
- Ensure the PI has or will have appropriate release time to remain within 100% effort should the proposal be awarded;

- Ensure that the Conflict of Interest statement is signed by all PIs and Co-Is and Senior Researchers;
- Identify any Research Compliance issues (e.g. IACUC, IRB, Biohazards, or Chemical Hazards) and check with the Institutional Official (and/or IACUC and IRB coordinator) to verify application/approval;
- Identify any Research Restrictions (e.g. Classified Research, ITAR/EAR, Restriction on Publications, or Restrictions on Non-Resident Employment) and check with Risk Management to verify approval;
- Identify any Intellectual Property/Technology Transfer (IP/TT) issues (e.g. Potential for Intellectual Property Disclosure or Potential for Program Income) and check with Risk Management to verify approval;
- Identify any matching/cost share (M/CS), and ensure it is **mandatory**, appropriate approval (signature acknowledging commitment of funds) from the unit dean/director is included, a letter of commitment from appropriate party should the M/CS source be from a third party, along with signed Third Party M/CS form, and the agency's published terms showing that it is mandatory M/CS are included. All instances of M/CS must be allowable per OMB Circular A-21 and conform to all provisions of OMB Circular A-110. NMU as a policy **does not allow voluntary cost share**;
- Identify any subawards, and ensure a budget, a statement of work, and a statement of institutional endorsement from each subrecipient's AOR is included;
- Identify any reductions from full allowable F&A recovery, and ensure that the sponsor's published terms showing that is a mandatory reduction are included. Reduced F&A is only allowed when required by the agency. Special consideration and approval is required for reduced F&A if it is not explicitly required by the agency;
- Check the unit cover page, if applicable, for consistency with the Proposal Transmittal Form.

b. Proposal Abstract and Body Review

The Proposal abstract and body will be reviewed as outlined:

- Ensure completeness of the proposal package per the sponsor's guidelines (if applicable);
- Ensure the format of the proposal package follows the sponsor's program announcement (if applicable);
- Read the abstract/text and identify/address any potential Research Compliance, Research Restriction, or IP/TT issues as outlined in **Section 3.a.** above.

c. Budget Review

A complete budget in the NMU budget template is required for all proposal approval **regardless** of sponsor guidelines. The proposal budget will be reviewed as outlined:

- (1) Ensure correct addition of the budget totals;
- (2) Ensure dollar amounts are consistent throughout the proposal text, Routing Form, cover page, budget and current and pending support (if applicable);

- (3) Ensure items are in the correct budget categories and are allowable direct or indirect costs;
- (4) Ensure that only allowable costs are listed as per the OMB Uniform Guidance and consistent with the NMU Cost Accounting Standards and policies;
- (5) Ensure that salaries have been calculated correctly for faculty, staff and students;
- (6) Ensure that appropriate leave and benefit rates have been used per NMU's current negotiated agreement, or that the use of projected rates has been disclosed in the budget narrative/justification;
- (7) Ensure that tuition remission has been included for graduate student research assistants employed during the academic school year, if allowed by the sponsor;
- (8) Ensure that travel categories have been identified (domestic/international), that trips are listed separately and accurately, and that the correct per diem rates are applied;
- (9) Ensure that a budget narrative/justification based on the NMU Grants and Contracts model has been included with the proposal package, **regardless** of sponsor requirements;
- (10) Ensure that the budget narrative/justification corresponds to the budget and supports the scope of work;
- (11) Ensure that MTDC has been calculated per NMU's negotiated agreement;
- (12) Ensure that F&A recovery is calculated properly;
- (13) Ensure that the correct F&A rate is being used per NMU's negotiated agreement and/or the sponsor's guidelines; Every proposal **must include F&A** unless prohibited by the agency, in which case documentation must be included in the proposal packet;
- (14) Ensure any instances of M/CS, subawards, or reduced F&A are identified/addressed as outlined in **Section 3.a.** above and abide by OMB Uniform Guidance regulations.

d. Proposal Problems

Problems that arise with a proposal during review will be addressed with the Grants and Contracts representative and/or PI in order to resolve them in a timely manner.

If the problems are not solved sufficiently to pass review, the proposal will be held in development phase with an explanation to allow ample time for the PI and/or Grants & Contracts representative to coordinate potential solution(s) to remedy the problems. Proposals that are not corrected within the deadline for submission will not be authorized or submitted.

e. Budget review and approval

Once the PI and Grants and Contracts Office has prepared and finalized the proposed budget, a representative from the Controller's Office will review the budget. The Controller's Office, Grants staff and AOR will review the budget to assure compliance with internal regulations and regulations specified in the OMB Uniform Guidance. If problems arise the budget will be returned to the Grants and Contracts Office with an explanation and plan for correction. The Controller's Office has been given authority by

the Vice President of Finance and Administration (CO) to approve the budget on his behalf. Once the final budget is approved the Controller's Office, the representative will sign the Proposal Transmittal Form indicating approval at that level.

e. AOR Approval

Once the proposal review has been completed and the proposal has passed the above review, it can be submitted to the required individuals (Dean, Department Head) and the Authorized Organizational Representative (AOR) for institutional approval, provided these individuals find no problems with the proposal. The proposal is then authorized for submission to the sponsor.

4. NMU Rights Regarding Proposals and Awards

Proposals that are submitted that do not allow sufficient review time may be authorized and submitted solely at the AOR's discretion, with the stipulation that a full review will take place after submission. NMU administration reserves the right to withdraw the proposal at any time and/or reject any award made on the proposal if any issues of non-compliance or other serious problems are discovered that place Northern Michigan University at unnecessary financial or legal risk.

5. Unauthorized Proposal Submissions

Northern Michigan University only authorizes proposal submissions with AOR approval. If a proposal is submitted to the sponsor without AOR approval, the full proposal package must still be reviewed. The PI will attest to their understanding of the process of authorized proposal review and submission, and will agree to not submit an unauthorized proposal again. If this agreement is violated, disciplinary action may be taken. The PI, his/her dean/director, the AOR, and the Provost will sign this agreement and each be given a copy. AOR signature will be granted if the proposal passes review as outlined in this policy. If the proposal does not pass review, it will be withdrawn. Any award granted as a result of an unauthorized proposal submission may be rejected at NMU's discretion as stated in **Section 4**.above. The PI will also be required to submit an explanation as to the nature of the unauthorized submission.

6. Archival of Proposals and Record Keeping

A hard copy of every proposal will reside in the NMU Grants and Contracts Office, where it will be archived for minimum of three (3) years. In addition, an electronic database will be kept that shows details about each proposal for statistical analysis and reporting.